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4 Attorneys for Debtors

5 UNITED STATES BANKRUPTCY COURT
6
7 NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: CASE No. 17-10828 WJL

9 FLOYD E. SQUIRES, III and CHAPTER 11
10 BETTY J. SQUIRES,

11 Debtors. / DECLARATION OF DAVID N. CHANDLER
RE: MOTION FOR DISCOVERY
SANCTIONS

12 Date: May 8, 2019
13 Time: 10:30 a.m.
Place: 1300 Clay St., Rm. 220
Oakland, CA

14
15 I, DAVID N. CHANDLER, declare and say:

16 1. That if called as a witness, I am competent to testify to
17 the within matters from my own knowledge.

18 2. CRG and Mark Adams provided additional documents relating
19 to the Requests for Production on April 29, 2019.

20 3. The documents provided do not include a privilege log and
21 do not include a verification.

22 4. Documents produced do include an additional 55 emails
23 which were directly responsive to the Requests and the assignment of
24 the Deed of Trust. However, the additional documents produced do
25 not include attachments to the emails produced but referenced in
26 such emails.

27 5. Communications with the City of Eureka after 11/30/17 were
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1 produced, however were not authenticated or states to represent all
2 written communication from and after 11/30/17.

3 6. Communications with the City of Eureka predating 11/30/17
4 were not produced.

5 Executed under penalty of perjury this 6th day of May, 2019 at
6 Santa Rosa, California.

7 /s/ David N. Chandler
8 David N. Chandler
9 Attorney for Debtors
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